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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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DOCKET FILE COPY ORIGINAL

DAVID C. KOELSCH  
(202) 835-8225

November 2, 1994

William F. Caton  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Ex Parte Letters -- PP Docket No. 93-253

Dear Mr. Caton:

Cook Inlet Region, Inc. ("CIRI") hereby gives notice of ex parte letters in the above-referenced proceeding.

The originals of the attached letters were delivered to Chairman Hundt. Copies of the letters were delivered to Commissioners Quello, Ness, Chong, and Barrett, as well as the Office of General Counsel and the Private Radio Bureau.

An original and one copy of these letters are being filed with your office.

Sincerely,



David C. Koelsch

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

# CIRI

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COOK INLET REGION, INC.

November 2, 1994

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street NW  
Washington D.C. 20554

Ex Parte Letter  
PP Docket No. 93-253

Dear Mr. Chairman:

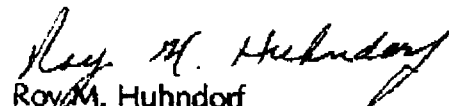
Cook Inlet Region, Inc. (CIRI) hereby provides two letters (copies attached) from industry representatives to support its position. We have asked several other companies to provide their input to the Commission, and we hope they will be able to do so within the limited time constraints.

CIRI also is prepared to commit to the Commission that, as a small and minority-owned Designated Entity, it will be limited to not more than 50% of the 98 licenses otherwise available to a Designated Entity (i.e. no more than 49 licenses can be acquired).

Two copies of this letter and the attachments have been submitted to the Office of the Secretary for inclusion in the record in this proceeding.

Very truly yours,,

COOK INLET REGION, INC.

  
Roy M. Huhndorf  
President & CEO

Attachments

RMH/p/01/01

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 1, 1994

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Mr. Chairman:

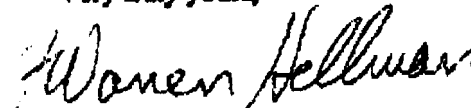
Hellman & Friedman is one of the largest private equity investors in the media and communications industry in the United States. We have a long track record of sponsoring businesses in the communications industry. For example, Hellman & Friedman is the largest shareholder in Western Wireless Corporation, one of the major independent cellular operators in the United States, and MobileMedia Communications, a major operator of paging systems and a recent participant in the FCC narrowband auctions.

We have held ongoing discussions with Cook Inlet Region, Inc. ("CIRI") regarding its possible participation in the PCN industry. From our perspective as institutional investors, CIRI is an attractive partner not only because of its investments in other communications businesses, but also because of the unique aspects of its shareholder base.

It is our understanding the Commission is re-considering the treatment of Native American tribes and Alaska Native Corporations for participation in the upcoming broadband PCS auctions. It is our belief that given CIRI's unique status and obligations as a Native American entity, CIRI is unlikely to achieve meaningful participation unless it can qualify as a small and minority Designated Entity ("DE") under the Commission's rules. CIRI will be competing with other entities that qualify for such treatment and is not an attractive partner without a full DE preference.

We hope the above information is helpful to the Commission in concluding its determinations.

Very truly yours,

  
F. Warren Hellman

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY



**THE TORONTO-DOMINION BANK**

U.S.A. Division  
31 West 52nd Street  
New York, N.Y. 10019-6101

Telephone No.

November 2, 1994

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Chairman Hundt:

We strongly endorse your concept of Designated Entities in the forthcoming PCS auctions since this will ensure that equal access to this limited spectrum is available not only to large well capitalized companies, but also to minorities with limited access to capital.

As a leading media and communications bank, Toronto Dominion acts as advisor to Cook Inlet Region (CIRI) in its quest to attract partners to allow it to bid for PCS licenses. However, our client believes, and we fully concur, that any definition of Designated Entities which does not allow CIRI to qualify fully for the maximum bidding credit and financing preferences will result in CIRI's inability to partner with any credible strategic partner. We would, therefore, implore you to ensure that Cook Inlet explicitly qualify as a small, minority Designated Entity. Toronto Dominion is of the firm view that, unless CIRI is treated as a small, minority Designated Entity, it will fully preclude CIRI and its shareholders from any form of meaningful participation in the PCS auctions. It is further our view that the only scenarios under which CIRI would enjoy the opportunity to achieve any meaningful participation would require the FCC to affirm the rules enabling CIRI to qualify as a small, minority designated entity.

Toronto Dominion in the past has played a critical role in the development of media and communications industries by taking a leadership position in structuring and providing capital to the cellular, cable and paging industries from their earliest stages of development. Looking forward, Toronto Dominion expects that it will lead the financing of the PCS industry, providing much of the capital crucial to the industry's development and success.

In 1993, CIRI retained Toronto Dominion to advise on the strategic and financial aspects of CIRI's possible participation in the PCS industry. Our conclusion was that in order to successfully bid, win and operate PCS systems, CIRI must be able not only to leverage its limited capital through governmental preference, but also to ally with a strong and credible strategic partner. In developing this strategy, Toronto Dominion remained cognizant of considerations unique to CIRI, namely: (i) CIRI consists of over 6,700 Native Americans, many of whom live below the poverty line; (ii) CIRI's shareholders rely heavily on CIRI's annual dividends to provide for food, shelter and clothing; (iii) shareholders' stock is non-alienable, (iv) the assets on CIRI's balance sheet have severe encumbrances which limit its access to capital, and (v) CIRI management and shareholders must, therefore, adhere to a prudent business practice of balancing and diversifying CIRI's portfolio of investments on a conservative risk basis. Consequently, while CIRI is prepared to put more capital at risk in PCS, it must be able to attract a strategic partner.

Honorable Reed E. Hundt  
November 2, 1994  
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**THE TORONTO-DOMINION BANK**

In order to attract a strategic partner, it is clear that CIRI must qualify as a small, minority Designated Entity. Without the full benefit of the maximum allowable bidding credits and government financing, CIRI will simply not be able to compete with well funded emerging consortia of small, minority and/or female investors. These consortia, with the deep pockets and sponsorship of aggregated professional athletes, entertainers, trust fund beneficiaries and professionals, we believe, are being syndicated with assets and investment flexibility far exceeding those of CIRI.

While CIRI will not be a successful bidder without full preferences, it will also be similarly handicapped and unsuccessful in its ability to form a strategic partnership. A cornerstone of CIRI's PCS strategy and success is to partner with an experienced cable or wireless operator capable of assisting CIRI in the build-out and operations of PCS licenses. Today, CIRI's wireless experience and skills are limited -- indeed, virtually non-existent. Therein lies a key facet of CIRI's opportunity. CIRI will, through the designated entity program, build its PCS operating and management experience with the critical assistance of an experienced partner. This is not unlike CIRI's experience in broadcast radio and television -- an area in which CIRI is today acknowledged to be an astute and capable operator.

In recent months CIRI has met with a variety of potential strategic partners, including many of the largest telecommunications companies in the United States. Simply put, CIRI is not an attractive partner to any of these companies without full preferences. Indeed, most of these potential partners have already identified an array of small/minority or female Designated Entities consortia with whom CIRI cannot compete unless it has the same preferences.

In summary, Toronto Dominion believes that unless CIRI is accorded the full preferences and advantages of a small, minority entity, then CIRI will fail to participate in the upcoming PCS auctions. This is because CIRI will be unsuccessful in arranging a strategic partnership critical to participation in the process.

Knowing the significant efforts CIRI has made to support the entire Designated Entity program, to have those efforts be fruitless seems unfortunate to us. This is particularly true insofar as, to our knowledge, there is no other serious potential Designated Entity which is composed of such needy shareholders.

Very truly yours,



Brian A. Rich  
Managing Director  
Communications Finance